

EXHIBIT 8

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	
)	
)	
Plaintiff,)	
vs.)	Case No.
)	2:23-cv-6302-HDV-AJR
)	
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through)	
10, inclusive,)	
)	
Defendants.)	

REPORTER'S TRANSCRIPT

VIDEOTAPED DEPOSITION OF

DR. ESHIOFE ASEKOMEH

Thursday, October 10, 2024

Via Zoom Video Conferencing

7:03 a.m.

Reported by: Rachel N. Barkume, CSR, RMR, CRR
Certificate No. 13657

Dr. Eshiofe Asekomeh

October 10, 2024

A P P E A R A N C E S

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THE VIDEOGRAPHER:

Jacob Rivera

ALSO PRESENT:

Eguono Erhun, In-House Counsel for Chevron

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1 Q. Okay. So for clarity and for the court
2 reporter, would you please spell the first name of the
3 first doctor you mentioned?

4 A. So the first doctor is Victor Adeyeye,
5 V-I-C-T-O-R, first name. Surname, Adeyeye,
6 A-D-E-Y-E-Y-E.

7 Q. Okay. And the second doctor?

8 A. The second doctor, first name, Ujomoti,
9 U-J-O-M-O-T-I.

10 Q. And the last name?

11 A. Akintunde, A-K-I-N-T-U-N-D-E.

12 Q. And the third doctor you identified?

13 A. Okay. So the third doctor, first name, Henry,
14 H-E-N-R-Y. Surname, Aiwuyo, A-I-W-U-Y-O.

15 Q. And you said you reviewed correspondence with
16 these three doctors?

17 A. Yes.

18 Q. And what do you mean by correspondence?

19 Were they letters? E-mails? Text messages?

20 A. E-mails. E-mails.

21 MS. LEAL: Counsel, I do not believe those
22 e-mails that Dr. Asekomeh just referred to were
23 produced, so I would request --

24 MR. MUSSIG: They were -- they were -- we
25 produced them this morning. Dr. Asekomeh can testify to

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1 this. He -- during our prep session, he referenced
2 them, and they took a little time to pull them, but we
3 got them and produced them this morning.

4 MS. LEAL: I have not had a chance to even open
5 up my e-mail, so if you sent them to me, I don't have
6 them.

7 MR. MUSSIG: Okay.

8 MS. LEAL: Perhaps I'll review them during a
9 break. And so we'll continue right now.

10 BY MS. LEAL:

11 Q. Okay. Dr. Asekomeh, what is your date of
12 birth?

13 A. 16 November, 1971. 16 November, 1971.

14 Q. So you're, what, 43 years old?

15 A. I'm 52 years old.

16 Q. Oh, 52. That's why I'm a lawyer. I'm horrible
17 at math.

18 Who is your employer, Dr. Asekomeh?

19 A. Okay. So my current employer is Deep Drill Oil
20 Services, Deep Drill Oil -- D-E --

21 (Simultaneous crosstalk.)

22 BY MS. LEAL:

23 Q. D-E-E-P?

24 A. D-E-E-P, Drill, D-R-I-L-L, Oil Services.

25 Q. Deep Drill Oil Services.

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1 A. So I can't exactly recollect now, but our
2 practice is such that you do phone calls and you do
3 e-mails and sometimes face to face conversations. So as
4 of that time, I was in Warri, and Dr. Victor's office
5 was only few doors away from mine, so we would have had
6 face-to-face discussion.

7 Q. With who?

8 A. Dr. Adeyeye.

9 Q. Victor.

10 A. Yes.

11 Q. So he was in the same location you were, so you
12 may have had face-to-face discussions with him?

13 A. Yes.

14 Q. The other two doctors were not at the same
15 location as you in Warri?

16 A. So Dr. Aiwuyo was in EGTL in Escravos here, and
17 Dr. Akintunde is based in Lagos.

18 Q. Okay. Now, looking at this document --

19 MS. LEAL: And I'll ask Jacob to scroll it.

20 BY MS. LEAL:

21 Q. And my question simply is: Are there any other
22 e-mails that you can recall having exchanged with any of
23 these three other doctors pertaining to Mr. Snookal?

24 A. As I said earlier, I was just able to open my
25 e-mails yesterday while the team in the U.S. -- Rob and

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1 his group were able to get this to -- from the back end.
2 So I will have to check again. Because I -- we -- there
3 was some change in the system that made it difficult to
4 access all the e-mails. I got the capacity to open them
5 up yesterday.

6 Q. So there may be additional e-mails that you may
7 find where you were corresponding with these three other
8 doctors regarding Mr. Snookal?

9 A. I will have to look at the sequence of these
10 ones. You are moving too fast. So this correspondence
11 is amongst four doctors. There's also -- Dr. Pitan was
12 being communicated, and that's my supervisor. Can you
13 scroll it from the beginning?

14 MR. MUSSIG: Do you mean from the bottom?

15 THE WITNESS: No, no, it's okay. It's okay.

16 MR. MUSSIG: Okay.

17 THE WITNESS: Yeah, it was a case summary I did
18 to Dr. Pitan at the end of all of this. I don't know if
19 that is included.

20 BY MS. LEAL:

21 Q. I have that as a separate exhibit that I'll
22 show you next. These are just e-mails.

23 A. Okay. I would have to go through my e-mails
24 again.

25 Q. Okay. So I would ask that you do check to see

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CERTIFICATE OF STENOGRAPHIC REPORTER

I, RACHEL N. BARKUME, a Certified Shorthand Reporter of the State of California, hereby certify that the witness in the foregoing deposition,

DR. ESHIOFE ASEKOMEH, was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein named; that the testimony of said witness was stenographically reported by me, a disinterested person, and was thereafter transcribed into typewriting.

Pursuant to Federal Rule 30(e), transcript review was requested.

I further certify that I am not of counsel or attorney for either or any of the parties to said deposition, nor in any way interested in the outcome of the cause named in said caption.

DATED: October 13, 2024.

Rachel N. Barkume

Rachel N. Barkume, CSR No. 13657, RMR, CRR